

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,

Case: 2:24-cr-20434  
Assigned To : Michelson, Laurie J.  
Referral Judge: Altman, Kimberly G.  
Filed : 8/7/2024

v.

D-1 DILANJAN MILLER,  
  
Defendant.

\_\_\_\_\_ /

**INFORMATION**

*THE UNITED STATES ATTORNEY CHARGES:*

**GENERAL ALLEGATIONS**

*At all times material to this Information:*

1. Steelworkers (USW), AFL-CIO, Local 2513, represented approximately 30 machine operators, inspectors, stock chasers, and rackers employed at Marsh Plating in Ypsilanti, Michigan.
2. DILANJAN MILLER was elected president of USW Local 2513 in April 2018.
3. MILLER also assumed all financial duties of USW Local 2513 as acting financial secretary and treasurer.
4. MILLER served as Local 2513 president and acted in the financial positions

until May 11, 2021, when he left his employment with Marsh Plating.

5. MILLER's duties and responsibilities as President included presiding over all meetings of the local union and countersigning union checks.
6. MILLER's duties and responsibilities as acting financial secretary and acting treasurer included: (a) receiving and depositing all monies due to the union; (b) signing all checks to be countersigned by the president and financial secretary; (c) keeping regular and correct accounts of all money received and paid by the union; and (d) making detailed financial reports at least once a month at each local union meeting covering the receipts and expenditures of all funds.
7. According to the USW Standard By-Laws for Local Unions, "the funds and property of the Local Union shall be managed, vested, expended, or otherwise used to implement and carry out the objects, rights, activities, and responsibilities of the Local Union or the International Union, and to administer the affairs of the Local Union . . . It shall be the duty of the President, Financial Secretary, and Treasurer to insure that the funds and property of the Local Union are preserved, managed, invested, and expended in accordance with the International Constitution, Manuals and policies, and these By-Laws."
8. USW Local 2513 held one checking account with the Bank of Ann Arbor

from August 30, 2005, until it was closed by the USW on May 28, 2021. In or around October 2018, MILLER obtained a VISA debit card linked to the Bank of Ann Arbor checking account.

9. The Bank of Ann Arbor has been insured by the FDIC since 1996.

**COUNT ONE**

(18 U.S.C. § 1344(2): *Bank Fraud*)

10. Paragraphs 1 through 9 of the “General Allegations” are included in this count.
11. From on or about June 2018, to on or about May 2021, in the Eastern District of Michigan, Southern Division, DILANJAN MILLER knowingly executed a scheme and artifice to obtain the moneys and funds owned by or under the custody and control of the Bank of Ann Arbor, a federally insured financial institution, by means of false and fraudulent pretenses, representations, and promises, as set forth below.
12. While President, acting financial secretary, and acting Treasurer of the union, MILLER fraudulently obtained approximately \$47,347 of union funds in the custody and control of the Bank of Ann Arbor by:
  - a) issuing approximately 38 unauthorized checks to himself and forging the signature of the second signatory on 20 of those checks;
  - b) issuing approximately 4 unauthorized checks made payable to a

family member; and

- c) making approximately 2 unauthorized cash withdrawals from the union's bank account.

13. MILLER also used the USW Local 2513 VISA debit card as his own personal debit card by making at least 184 unauthorized purchases totaling approximately \$11,259.84. All of the purchases were outside of normal union expenses. MILLER obtained this card without the knowledge and approval of the union.

- a. Personal retail store purchases including the following:

11/05/2018	Jordan Jewelers (Dearborn, MI)	\$204.25
11/06/2018	Footaction (Dearborn, MI)	\$413.40
12/11/2018	Footaction (Las Vegas, NV)	\$238.15
02/11/2019	Finish Line (Dearborn, MI)	\$201.40
02/11/2019	Foot Locker (Dearborn, MI)	\$201.40

- b. Personal vehicle rentals including the following:

02/26/2019	Dollar Car (West Palm Beach, FL)	\$411.48
02/25/2020	Dollar Car (West Palm Beach, FL)	\$551.67
11/18/2020	Dollar Car (Atlanta, GA)	\$537.27
02/23/2021	Dollar Car (Ft. Lauderdale, FL)	\$490.74

- c. Personal airfare or flight expenses for personal airfare including the

following:

02/15/2019	Spirit Airlines (Detroit to Palm Beach FL)	\$345.58
08/14/2020	Spirit Airlines (Detroit to Las Vegas NV)	\$39.70
10/16/2020	Spirit Airlines (Detroit to Atlanta GA)	\$141.58
01/19/2021	Spirit Airlines (Detroit to Ft. Lauderdale)	\$132.80
02/02/2021	Spirit Airlines (Detroit to Ft. Lauderdale)	\$49.98

d. Lodging accommodations including the following:

06/24/2020	Rodeway Inn (Romulus, MI)	\$67.29
08/24/2020	Apple Tree Inn (Saginaw, MI)	\$72.15
09/30/2020	AirBNB (Mrytle Beach, SC)	\$241.02
04/26/2021	Apple Tree Inn (Saginaw, MI)	\$144.30

e. Personal fuel, meal, and bar purchases including the following:

08/28/2020	Motor City Casino (Detroit, MI)	\$104.95
09/21/2020	Pantheon Lounge (Dearborn, MI)	\$70.58
09/23/2020	Pantheon Lounge (Dearborn, MI)	\$86.45
04/21/2021	Opyum Lounge Detroit, MI	\$75.85

14. The approximate amount of unauthorized payments to MILLER and unauthorized purchases made by MILLER is as follows:

Unauthorized Checks to Self and Family Member	\$46,737
Unauthorized Debit Card Purchases	\$11,259.84

Unauthorized Cash Withdrawals	\$700
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TOTAL	\$58,696.84
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All in violation of Title 18, United States Code, Section 1344(2).

DAWN N. ISON  
United States Attorney

s/ John K. Neal  
John K. Neal  
Assistant United States Attorney  
Chief, Public Corruption and Civil Rights Unit

s/ Sarah Resnick Cohen  
Sarah Resnick Cohen  
Assistant United States Attorney

Dated: August 7, 2024

United States District Court  
Eastern District of Michigan

## Criminal Case Cover Sheet

Case Number  
24-mj-30152

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. Dilanjana Miller

County where offense occurred : Washtenaw County and elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 24-mj-30152 ]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

August 7, 2024  
Date

s/ Sarah Resnick Cohen  
 Sarah Resnick Cohen  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.